IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

TOMEKA L. TAPER,

Plaintiff,

٧.

No. CT-002508-14 Division VIII Jury Demanded

NICHOLAS EDWARD DUGGAN and JACK KEY AUTO TRANSPORT, INC. a/k/a RED LEASING, INC.,

Defendants.

NOTICE OF FILING PETITION FOR REMOVAL

COMES NOW the Defendant, Jack Key Auto Transport, Inc., a Texas Corporation, pursuant to 28 U.S.C. § 1446(d) and serves notice to counsel for Plaintiff, and to the Clerk of the Circuit Court of Shelby County, Tennessee for the Thirtieth Judicial District at Memphis that the above-styled cause has been removed to the United States District Court for the Western District of Tennessee, Western Division, pursuant to the provisions of 28 U.S.C. § 1441.

A copy of the Petition for Removal as filed by Defendant Jack Key Auto Transport, Inc., with the Clerk of the United States District Court for the Western District of Tennessee, Western Division, on July 17, 2014, is attached.

Respectfully submitted,

SHUTTLEWORTH, WILLIAMS, PLLC

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Attorneys for Jack Key Auto Transport, Inc.

CERTIFICATE OF SERVICE

This certifies that a true and correct copy of the above and foregoing document has been forwarded, via U.S. Mail, postage prepaid, this the _____ day of July, 2014 to:

Mark N.Geller Nahon, Saharavich & Trotz, PLC 488 South Mendenhall Memphis, TN, 38117